

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NEW YORK

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In re:

CHAPTER 13

HALUK INCE

Debtor(s).

BK No. 16-21175

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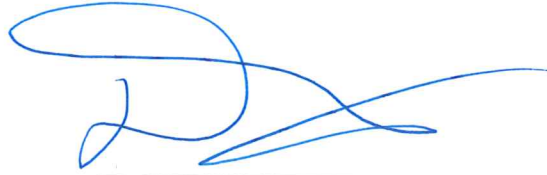
**RESPONSE TO TRUSTEE'S CONFIRMATION REPORT**

The debtor herein, Haluk Ince ("Debtor"), through his undersigned counsel, for his response to the Amended Trustee's Confirmation Report dated April 20, 2018, represents as follows:

1. Tower Management has consented to the treatment of its claim under the Plan.
2. Debtor has moved to value the secured claims of American Tax Funding, Tower Management and Monroe County, to which no opposition was interposed, which remains pending before this Court.
3. The Debtor moved to object to the unsecured portions of the allowed secured claims of holders for claims secured by real estate tax liens, but the motions were denied by the Court.
4. The Third Amended Plan filed herein on February 5, 2018 (Docket No. 10), provides for disallowance of the unsecured portions of the secured claims of taxing authorities.

WHEREFORE, Debtor respectfully requests that the Court overrule the Trustee's objections to confirmation, confirm the Debtor's Plan filed herein on August 22, 2017, and grant such other and further relief as the Court deems just, proper and equitable.

Dated: April 26, 2018

A handwritten signature in blue ink, appearing to be 'D. Ealy', written over a horizontal line.

David H. Ealy, Esq., Of Counsel  
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